

# NRC INSPECTION MANUAL

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## PART 9900: TECHNICAL GUIDANCE

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AMERICAN NATIONAL STANDARDS INSTITUTE/  
AMERICAN SOCIETY OF MECHANICAL ENGINEERS

ANSI/ASME NQA-1-1989, SUPPLEMENT 17S-1, SECTION 5

### A. PURPOSE

To provide guidance to NRC inspectors relative to the time permitted a licensee to retrieve a document which is required to be retrievable.

### B. POLICY

The licensee and the inspector should agree on a reasonable time for the licensee to retrieve a particular record.

### C. DEFINITIONS

1. ANSI - American National Standards Institute
2. ASME - American Society of Mechanical Engineers
3. NQA - National Quality Assurance
4. Reasonable - Amenable to both parties

### D. APPLICABILITY

This guidance is applicable to all inspection programs under NRC Inspection Manual Chapters 2500 and 2700.

### E. DISCUSSION

The Commanche Peak Report Review Group identified the lack of guidance for NRC inspectors relative to the time permitted for a licensee to retrieve a document which is required to be retrievable. Section 5 of Supplement 17S-1 to ANSI/ASME NQA-1-1989, "Quality Assurance Program Requirements for Nuclear Facilities," endorsed by Regulatory Guide 1.28, "QA Program Requirements," specifies that

record storage systems shall provide for the retrieval of information in accordance with planned retrieval times. However, it contains no guidance relative to the time that should be permitted for record retrieval.

The staff has taken the position that the time permitted for a licensee to retrieve a required document(s) should be (1) reasonable, (2) agreed upon by the NRC inspector and the licensee and (3) based on the following factors:

1. The importance to safety, of the record(s) to be retrieved, with consideration given to the situation at hand, which may include but are not limited to requests made during (1) normal operations, (2) accident or emergency conditions, (3) an investigation, or (4) an inspection.
2. The location of the document(s) to be retrieved and whether they can be readily obtained at the location of the requester or whether they must be retrieved at a location distant or remote from the requestor.
3. The quantity or profusion of the records to be retrieved (one page, one volume, several volumes, etc.).

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